

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

Estate of Terry Williams;
By Special Administrator Cuc Huynh
L.W. Daughter of Terry Williams
By Laquesha Green and Cuc Hutnh

-Plaintiff

Case No: 18-CV-1222

vs.

Michael Traux, Deputy for the Milwaukee
Sheriff's Department, and John Doe #1, and
Other unnamed members

-Defendant(s)

MOTION TO WITHDRAW AS ATTORNEY

PLEASE TAKE NOTICE that Attorney Paul A. Strouse, counsel for Plaintiff, is moving this Court for permission to withdraw as counsel of record in the above-captioned case at a time set by the Court.

As grounds therefore, the undersigned provides the following information:

A. SCR 20:1.16(a) lists circumstances when a lawyer may withdraw from representing a client, including:

(2) the lawyer's physical or mental condition materially impairs the lawyer's ability to represent the client.

B. In explaining how counsel's present physical and mental condition affects his ability to represent the victim, counsel presents the following facts:

1. In December, 2019 my 89 year old mother went to San Diego, California to spend time with her boyfriend. While there she fell and fractured a vertebrae in her neck.
2. In January, 2020, I had to fly to San Diego to bring her back to Milwaukee. At this time I discovered my mother, who was ordinarily as sharp as a tack, was starting to slip. She had trouble remembering things and would easily get lost.
3. So, I decided to move in with her to take care of her.
4. Also, at this time I had a support staff of three (3) full time employees. Starting in April, 2020 through May, 2020 I lost all three (3).
5. The biggest loss was my long-time office manager. She left on medical leave in early May. She had her first surgery May 5, 2020. She returned to work for about a week but was still feeling ill. She had her second surgery later that month. She did not return to work until February, 2021.
6. For the next couple of months I had no support staff and I tried doing everything myself. By July, 2020 I had hired three (3) new employees, who were all gone within sixty (60) days.
7. It was around this time that two additional things happened:
 - a. First, my mother fell a second time. My mother, and the caretaker I hired to watch her during the day, were out shopping when my mother fell, breaking a second vertebrae in her neck. The result of this second fall was my having to spend more time caring for her.
 - b. Second, at about the same time as my mother's second fall I started getting sick. In August, 2020 I was able to see my doctor, who gave me a full checkup. One Sunday afternoon he called me to inform me that I had diabetes. He was alarmed because my blood sugar level was dangerously high. He called into my pharmacy a prescription for

Metformin and gave me the phone number for the Diabetes Clinic. I was able to get an appointment two (2) weeks later. I was immediately started on an insulin regimen that included ten (10) units of NovoLog three (3) times a day and thirty (30) units of Toujeo one (1) time a day. I started feeling better three to four weeks later.

8. Then on September 1, 2020, after having my office at 413 North 2nd Street, Suite #150, Milwaukee, Wisconsin for ten (10) years and six (6) months, I received notice from my landlord that he would not be renewing my lease. I had to vacate the premises by September 30, 2020. After considerable begging, including the payment of a large amount of money above the regular September and October rent, I was able to extend the deadline to October 31, 2020.
9. So, I spent a good part of the next sixty (60) days first, looking for a suitable office and second, making arrangements for the move.
10. It was about this time I noticed that my eyesight was beginning to get blurry. I thought it was a result from lack of sleep. However, it continued to get worse.
11. In December 2020, I went to the DMV to renew my driver's license and I couldn't pass a simple eye exam for the first time in my life. I went to see an ophthalmologist a few days later and I was told I had cataracts in both eyes.
12. I scheduled an appointment with an eye surgeon a few weeks later. He scheduled and performed cataracts surgery on my right eye on March 1, 2021 and did my left eye on March 15, 2021.
13. Literally, I was unable to read or complete any meaningful work from December 2020 to March, 2021, even though I had replaced my regular computer screen with a big screen television and I used a jeweler's magnifying glass to read.
14. The surgeries were a success and by the end of March, 2021 I had my eyesight back.
15. In November 2020 my mother, who was now 90, fell a third time and fractured her hip. It was a serious fracture that required surgery. Afterward,

I placed her in the Silverado North Shore Care Facility in order for her to get rehabilitation for her injury.

16. This was a very difficult time. Because of the COVID-19 I could only visit her one (1) hour a week. My mother's health declined until she was put on hospice on January 15, 2021. I was lucky, they allowed me to spend the last twenty-four (24) hours of her life in her room with her. She passed on January 16, 2021.
17. On June 21, 2021, in the middle of the day, my entire staff walked off the job, never to return.
18. On December 23, 2021, I was suspended from practice before the Eastern District of Wisconsin Bankruptcy Court for a period of not less than one year effective as of January 3, 2022 (See attached Exhibit #1).
19. On that same day, I self-reported the bankruptcy Court's discipline, and my conduct that led to it, to the Office of Lawyer Regulation ("OLR"). An investigation has been opened in that matter by OLR (See attached Exhibit #2). I anticipate OLR will soon act to suspend my license. I have no plans to challenge the suspension.
20. Shortly thereafter I sought professional medical help for severe depression and anxiety.
21. Presently, I am in therapy, and am being treated for severe depression and anxiety with Prozac-30 mg, Zoloft-50 mg and Trazodone-50 mg.
22. On January 28, 2022, my last employee will be leaving her employment with my office.

C. Because of my present physical and mental condition my ability to represent victim has been materially impaired and I am no longer capable of representing the victim.

D. Further, I am closing my office on January 31, 2022.

E. I am filing this motion to ensure that my physical and mental condition, as well as my imminent suspension, is brought to the Court's attention in order to allow victim time to secure new counsel.

F. Until new counsel is obtained, counsel is asking the court to adjourn the hearing dates.

G. Counsel is prepared to hand over all discovery and file materials to victim or new counsel, if this motion is granted by the court.

Based upon these facts counsel is requesting the court's permission to withdraw as counsel of record for the victim in this matter.

Dated at Milwaukee, Wisconsin, January 28th, 2022.

Respectfully submitted,

Electronically signed by:

/s/Paul Allen Strouse

Paul Allen Strouse

State Bar No. 1017891

Strouse Law Offices
825 West Wisconsin Avenue
Milwaukee, WI 53233
414-390-0820
414-515-2112
Strouselawoffices@gmail.com